

1 NIAL E. LYNCH (State Bar No. 157959)  
MICHAEL L. SCOTT (State Bar No. 165452)  
2 HEATHER S. TEWKSBURY (State Bar No. 222202)  
DAVID J. WARD (State Bar No. 239504)  
3 ALEXANDRA J. SHEPARD (State Bar No. 205143)  
Antitrust Division  
4 U.S. Department of Justice  
450 Golden Gate Avenue  
5 Box 36046, Room 10-0101  
San Francisco, CA 94102  
6 Telephone: (415) 436-6660

7 Attorneys for the United States

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11  
12 IN RE TFT-LCD (FLAT PANEL)  
13 ANTITRUST LITIGATION

NOTICE OF RELATED  
CASE IN A CRIMINAL  
ACTION

Case No. M 07-1827 SI

14  
15  
16 UNITED STATES OF AMERICA

17 v.

18 LG DISPLAY CO., LTD. and  
19 LG DISPLAY AMERICA, INC.,

Case No. CR 08-0803 SI

20 Defendants.

21  
22 UNITED STATES OF AMERICA

Case No. CR-08-0802 SI

23 v.

24 SHARP CORPORATION,

25 Defendant.

26  
27 [CAPTION CONTINUES ON NEXT PAGE]

28 ///

NOTICE OF RELATED CASE - PAGE 1  
Case No. CR-09-0110 MMC

1  
2 UNITED STATES OF AMERICA

3 v.

4 CHUNGHWA PICTURE TUBES, LTD.,

5  
6 Defendant.

Case No. CR-08-0804 SI

7 UNITED STATES OF AMERICA

8 v.

9  
10 CHANG SUK "C.S." CHUNG,

11  
12 Defendant.

Case No. CR-09-0044 SI

13 UNITED STATES OF AMERICA

14 v.

15  
16 CHIENG-HON "FRANK" LIN,  
17 CHIH-CHUN "C.C." LIU, and  
HSUEH-LUNG "BRIAN" LEE,

18 Defendants.

Case No. CR-09-0045 MHP

19  
20 UNITED STATES OF AMERICA

21 v.

22 CHENG YUAN "C.Y." LIN,  
23 WEN JUN "TONY" CHENG, and  
24 DUK MO KOO,

25 Defendants.

Case No. CR-09-0110 MMC

26 The United States, under Crim. L. R. 8-1, files this Notice of Related Cases in a  
27 Criminal Action for this criminal case, United States v. Cheng Yuan "C.Y." Lin, Wen Jun  
28 "Tony" Cheng, and Duk Mo Koo, to the five previously filed criminal cases related to Judge

1 Susan Illston, United States v. LG Display Co., Ltd. and LG Display America, Inc., CR 08-  
2 0803 (SI), United States v. Sharp Corp., CR 08-0802 (SI), United States v. Chunghwa Picture  
3 Tubes, Ltd., CR 08-0804 (SI), United States v. Chang Suk "C.S." Chung, CR 09-0044 (SI),  
4 and United States v. Chieng-Hon "Frank" Lin, Chih-Chun "C.C." Liu, and Hsueh-Lung  
5 "Brian" Lee, and to the previously filed civil case assigned to Judge Susan Illston, In re TFT-  
6 LCD (Flat Panel) Antitrust Litigation, M 07-1827 (SI). These civil and criminal antitrust  
7 cases concern one or more of the same defendants and allege similar events and occurrences.

8 On November 12, 2008, the United States filed three separate Informations in United  
9 States v. LG Display Co., Ltd. and LG Display America, Inc., United States v. Sharp Corp.,  
10 and United States v. Chunghwa Picture Tubes, Ltd. charging the three corporate defendants  
11 with participating in conspiracies to fix the prices of TFT-LCD in violation of Section 1 of the  
12 Sherman Act (15 U.S.C. § 1). The United States and the three defendants filed stipulated  
13 notices of a related case on November 14, 2008, requesting that the cases be related to the  
14 pending civil class action before Judge Illston, In re TFT-LCD (Flat Panel) Antitrust  
15 Litigation, M 07-1827 SI. The three cases were related to Judge Illston on November 20,  
16 2008.

17 Judge Illston sentenced the three corporate defendants on December 15, 2008 (LG  
18 Display Co., Ltd. and LG Display America, Inc), December 17, 2008 (Sharp Corporation),  
19 and January 14, 2009 (Chunghwa Picture Tubes, Ltd).

20 On January 15, 2009, the United States filed two separate Informations. The first  
21 Information charged Chang Suk "C.S." Chung, an LG executive, with participating in the  
22 TFT-LCD price-fixing conspiracy. The second Information charged Chieng-Hon "Frank"  
23 Lin, Chih-Chun "C.C." Liu, and Hsueh-Lung "Brian" Lee, current and former Chunghwa  
24 executives, with participating in the same conspiracy. Both Informations were related to  
25 Judge Illston on January 23, 2009. These four defendants are scheduled to be sentenced over  
26 the next two weeks.

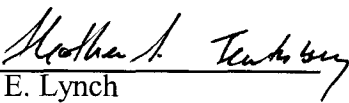
27 On February 4, 2009, the United States filed an Indictment in United States v. Cheng  
28 Yuan "C.Y." Lin, Wen Jun "Tony" Cheng, and Duk Mo Koo, CR-09-0110 MMC, charging

1 defendants Cheng Yuan "C.Y." Lin, Wen Jun "Tony" Cheng, and Duk Mo Koo with  
2 participating in the same TFT-LCD price-fixing conspiracy. There are common events and  
3 occurrences alleged in this case and the six predecessor cases pending before Judge Susan  
4 Illston. Specifically, the indicted defendants are former employees of Chunghwa Picture  
5 Tubes, Ltd., which pled guilty and was sentenced on January 14, 2009 for its involvement in  
6 the price-fixing conspiracy, and a former employee of LG Display, which pled guilty and was  
7 sentenced on December 15, 2008 for its role in the conspiracy.

8 Accordingly, the assignment of United States v. Cheng Yuan "C.Y." Lin, Wen Jun  
9 "Tony" Cheng, and Duk Mo Koo to Judge Susan Illston is therefore likely to conserve  
10 judicial resources and promote an efficient determination of the action.

11 DATED: February 13, 2009

12 Respectfully submitted,

13  
14 BY:   
15 Niall E. Lynch  
16 Michael L. Scott  
17 Heather S. Tewksbury  
18 David J. Ward  
19 Alexandra J. Shepard  
20 U.S. Department of Justice  
21 Antitrust Division  
22 450 Golden Gate Ave.  
23 Box 36046, Room 10-0101  
24 San Francisco, CA 94102  
25 (415) 436-6660  
26 Fax: (415) 436-6687  
27  
28

**CERTIFICATE OF SERVICE**

I, Liliana C. Vallejo, certify:

That I am a citizen of the United States and am employed by the U.S. Department of Justice, Antitrust Division, at 450 Golden Gate Avenue, Room 10-0101, San Francisco, CA 94102; I am over the age of eighteen years; and am not a party to the within action.

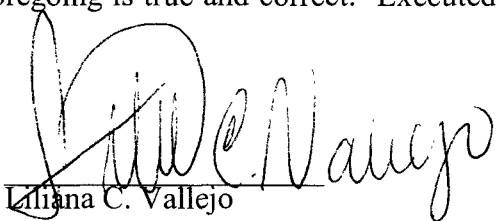
That on February 13, 2009, I served via fax and United States Postal Service mail a copy of the **NOTICE OF RELATED CASE IN A CRIMINAL ACTION** on the following counsel:

Robert E. Welsh, Esq.  
Welsh & Recker  
2000 Market Street  
Suite 2903  
Philadelphia, Pennsylvania 19103  
Fax: (215) 972-6436

George Beckwith, Esq.  
Law Offices of George Beckwith  
507 Polk Street  
Suite 340  
San Francisco, CA 94102  
Fax: 415-771-6734

Barry F. McNeil, Esq.  
Haynes and Boone, LLP  
2323 Victory Avenue  
Suite 700  
Dallas, Texas 75219  
Fax: +1 214.200.0535

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 13, 2009, at San Francisco, California.

  
Liliana C. Vallejo